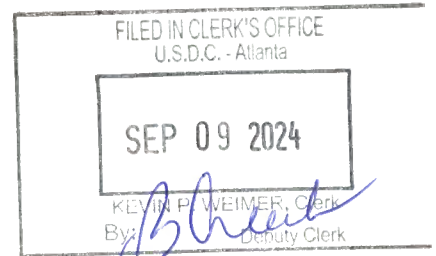


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION
STATE OF GEORGIA



LAW OFFICES OF JUSTIN CHIN LLC
JUSTIN ALLEN CHIN, ESQ.
Plaintiff,

Vs.

STATE BAR OF GEORGIA
FOUNDATION, INC.,
STATE BAR OF GEORGIA OFFICE THE
GENERAL COUNSEL, PAULA FREDERICK,
In her Official Capacity
Defendants.

CIVIL ACTION FILE
NO.
JURY TRIAL DEMANDED

1 : 2 4 - CV - 4 0 2 9

COMPLAINT AND DEMAND FOR JURY TRIAL

COMES NOW, Plaintiff, LAW OFFICES OF JUSTIN CHIN LLC, in the above-styled case, and hereby files this Complaint against the Defendants, STATE BAR OF GEORGIA FOUNDATION, INC.(herein after “Defendant SBGF”), a Domestic Non-Profit Corporation, State Bar of Georgia Office of the General Counsel (herein after “Defendant OGC”), a subsidiary of the State Bar of Georgia, and Paula Frederick (herein Defendant “Defendant Frederick or “Frederick”), In her Official Capacity as Assistant General Counsel for the State Bar of Georgia for discrimination based on race in violation of the Civil Rights Act of 1866, 42 U.S.C. § 1981, and alleges as follows:

Complaint and Demand for Jury Trial

INTRODUCTION

1. Defendants violated the Civil Rights Act of 1866, 42 U.S.C. § 1981 by engaging in racial discrimination against Asian and African American attorneys who are members of the State Bar of Georgia, such as Plaintiff (“Law Offices of Justin Chin LLC”).
2. Law Offices of Justin Chin LLC brings ~~h~~ 42 U.S.C. § 1981 claims of race discrimination against SBGF, OGC, and their Assistant General Counsel, Defendant Paula Frederick, and seeks damages, attorney’s fees (42 U.S.C. § 1981), litigation expenses and costs.

JURISDICTION AND VENUE

3. The Court has jurisdiction under 28 U.S.C. § 1331 (federal question) and under 28 U.S.C. § 1343 (civil rights).
4. The acts or omissions which made the basis of this suit occurred in Fulton County, Georgia and in this judicial district, so venue is proper in this Court under 42 U.S.C. § 1391.
5. No administrative exhaustion or other conditions precedent are required prior to the filing of claims under 42 U.S.C. § 1981.

Complaint and Demand for Jury Trial

THE PARTIES

6. Plaintiff Mr. Justin Allen Chin is an Asian American male and a licensed attorney in the State of Georgia who is a member of the State Bar of Georgia in good standing since 2012 to present.
7. Defendant State Bar of Georgia Foundation, Inc.¹ (“Defendant SBGF”) is a domestic non-profit corporation registered in the State of Georgia. Defendant may be personally served by and through its registered agent William D. NeSmith, III at its principal address located at 104 Marietta Street, NW, Suite 100, Atlanta, Georgia 30303.
8. Defendant State Bar of Georgia Office of General Counsel (“Defendant OGC”) is a subsidiary of the State Bar of Georgia (“Defendant SBGF”) and Defendant OGC may be personally served by and through its registered agent William D. NeSmith, III at its principal address located at 104 Marietta Street, NW, Suite 100, Atlanta, Georgia 30303.

NATURE OF THE COMPLAINT

9. This is a Complaint filed by the Plaintiff, Justin Allen Chin, Esq. who is also Asian American on behalf of herself and others similarly situated against the Defendants for damages, costs, and attorneys' fees, alleging a continuing pattern of racially discriminatory conduct in violation of the Civil Rights Act of 1866, 42 U.S.C. § 1981 against Plaintiff and all those similarly situated.
10. Plaintiff hereby adopts and incorporate all allegations by Plaintiff and on behalf of all others similarly situated in Mignott Vs. State Bar of Georgia Foundation, Inc, et al. (CAFN: 1:23-cv-0834-ELR, filed 04/23/23), hereto attached as Exhibit "A".

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays that this Honorable Court enters judgment in his favor and against the Defendants for the following relief:

- A. A declaratory judgment that the actions, conduct and practices of the Defendants complained of herein violate the laws of the United States and the State of Georgia;
- B. An award of injunctive relief necessary to cure Defendants' discriminatory policies and practices;
- C. An award of damages to Plaintiff and the Proposed Class and against the Defendants, in an amount to be determined at trial, to compensate them for all monetary and or economic damages;
- D. An award of damages to Plaintiff and the Proposed Class and against Defendants, in an amount to be determined at trial, to compensate them for all non-monetary and

Complaint and Demand for Jury Trial

or compensatory damages, including but not limited to, loss of reputation, loss of opportunity and mental anguish;

- E. An award of punitive damages to Plaintiff and the Proposed Class and against the Defendants in an amount to be determined at trial;
- F. Pre-and post-judgement interest on all amounts due;
- G. An award of Plaintiff and the Proposed Class' reasonable attorneys' fees and costs; and
- H. Such other and further relief as this Honorable Court deem just and proper.

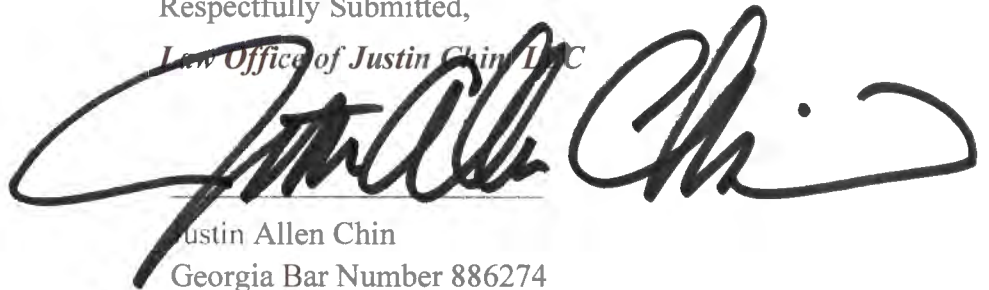
JURY DEMAND

Plaintiff and the Proposed Class hereby demand a trial by jury.

This 9th day of September, 2024.

Respectfully Submitted,

Law Office of Justin Chin LLC

A large, stylized handwritten signature in black ink, appearing to read 'Justin Allen Chin', is written over a horizontal line.

Justin Allen Chin

Georgia Bar Number 886274

2870 Peachtree Road #442
Atlanta, Georgia 30305
404-260-7393 (office)
866-475-0083 (facsimile)
jchin@chinfamilylaw.com

Complaint and Demand for Jury Trial